

Marc V. Kalagian
Attorney at Law: 4460
Law Offices of Rohlfing & Kalagian, LLP
211 East Ocean Boulevard, Suite 420
Long Beach, CA 90802
Tel.: (562)437-7006
Fax: (562)432-2935
E-mail rohlfig.kalagian@rksslaw.com

Attorneys for Plaintiff
BETTY UNCANGCO

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BETTY UNCANGCO,)	Case No.: 2:14-cv-00824-APG-PAL
Plaintiff,)	
)	UNOPPOSED MOTION TO AMEND
vs.)	AND EXTEND BRIEFING
)	SCHEDULE
CAROLYN W. COLVIN, Acting)	
)	
Commissioner of Social Security,)	
)	
Defendant)	
)	

Plaintiff Betty Uncangco ("Plaintiff") and defendant Carolyn Colvin, Commissioner of Social Security ("Defendant"), through their undersigned counsel of record, hereby stipulate, subject to the approval of the Court, to extend the time for Plaintiff to file Plaintiff's Motion for Reversal and/or Remand to March 5, 2015; and that Defendant shall have until April 3, 2015, to file her opposition, if any is forthcoming. Any reply by plaintiff will be due April 23, 2015.

1 A second extension of time for plaintiff is needed in order to properly
2 address the issues within the administrative record in this matter. Counsel
3 sincerely apologizes to the court for any inconvenience this may have had upon it
4 or its staff.

5 Counsel for defendant has indicated, via e-mail, that this motion to extend
6 the time to file is not opposed.

7 DATE: January 27, 2015 Respectfully submitted,

8 ROHLFING & KALAGIAN, LLP

9 /s/ *Marc V. Kalagian*

10 BY: _____

11 Marc V. Kalagian

12 Attorney for plaintiff BETTY UNCANGCO

13 ORDER

14 IT IS SO ORDERED.

15
16 
17 UNITED STATES MAGISTRATE JUDGE

18 DATED: February 2, 2015